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December 6, 2022

VIA ECF

Honorable Analisa Torres, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Nicole Elliot, et al. v. Trusted Media Brands, Inc., Case No. 1:22-cv-08740-AT – Request for Extension of Deadline for Case Management Plan and Scheduling Order

Dear Judge Torres:

We represent Defendant Trusted Media Brands, Inc. (“Defendant”) in this matter. Pursuant to this Court’s Individual Practices, we write to respectfully request an extension of time to submit the parties’ Case Management Plan and Scheduling Order. Defendant has conferred with Plaintiff’s counsel and Plaintiff does not oppose the requested relief.

Defendant was served with the Complaint on October 18, 2022 and requested an extension of time to respond to January 9, 2023 (Dkt. 15), which this Court granted (Dkt. 16.). Pursuant to the Court’s October 18, 2022 Initial Pretrial Scheduling Order, however, this Court set a deadline for the parties to submit a joint proposed Case Management Plan and Scheduling Order by December 12, 2022.

Given that Defendant’s response to Plaintiff’s Complaint is not due until January 9, 2023 and Defendant is contemplating the filing of a Rule 12 motion, Defendant respectfully requests that the deadline to submit a Case Management Plan and Scheduling Order be extended until after Defendant’s deadline to respond. Defendant, therefore, respectfully requests that the deadline to submit a Case Management Plan and Scheduling Order be re-set for February 13, 2023. This brief extension—Defendant’s first such request—will not prejudice any party, as no other deadlines have been set other than Defendant’s response to the Complaint.

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For the foregoing reasons, Defendant respectfully requests that the Court grant its request and that the deadline to submit the parties' Case Management Plan and Scheduling Order be extended until February 13, 2023.

Respectfully submitted,

/s/ Eric R. Fish

Eric R. Fish

cc: All Counsel of Record (*via ECF*)

GRANTED. By **February 13, 2023**, the parties shall file their joint letter and a proposed case management plan.

Dated: December 7, 2022
New York, New York



ANALISA TORRES
United States District Judge